

EXHIBIT G

The Honorable Judge Marsha Pechman



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

TRAVIS MICKELSON, DANIELLE H.  
MICKELSON, and the marital community  
thereof,

Plaintiffs,

v.

CHASE HOME FINANCE, LLC, an unknown  
entity; JPMORGAN CHASE BANK, N.A., a  
foreign corporation; MORTGAGE  
ELECTRONIC REGISTRATION SYSTEMS,  
INC., a foreign corporation; NORTHWEST  
TRUSTEE SERVICES, INC., a domestic  
corporation; JOHN DOES, unknown entities;  
MORTGAGEIT, INC., a foreign corporation;  
GMAC MORTGAGE CORPORATION, a  
foreign corporation; CHICAGO TITLE, an  
unknown corporation; ROUTH CRABTREE  
OLSEN, P.S., a domestic Personal Services  
Corporation; and FEDERAL HOME LOAN  
MORTGAGE CORPORATION, a corporation,

Defendants.

No. C11-01445 MJP

**DEFENDANT NWTS' SECOND  
AMENDED AND SUPPLEMENTAL  
RESPONSES TO PLAINTIFFS' FIRST  
SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION**

COMES NOW, Defendant Northwest Trustee Services, Inc. ("NWTS") and amends and supplements its previous responses to Plaintiffs Travis and Danielle Mickelson's ("Plaintiffs") First Set of Interrogatories and Requests for Production on Defendant NWTS ("Requests") as set forth in (1) Defendant NWTS' Responses to Plaintiff's First Set of Interrogatories and Requests for Production ("First Responses") and (2) the letter dated March 14, 2012, which amended and supplemented NWTS' First Responses ("March 2012 Letter").

DEFENDANT NWTS' RESPONSES TO  
PLAINTIFFS' INTERROGATORIES AND  
RFPS.1 of 11 C11-01445 MJP

ORIGINAL

ROUTH  
CRABTREE  
OLSEN, P.S.

13555 SE 36th St., Ste 300  
Bellevue, WA 98006  
Telephone: 425.458.2121  
Facsimile: 425.458.2131

1       **INTERROGATORY NO. 6:** Identify the individual or entity you contend to be the Beneficiary  
2 at the time of the trustee's sale of Plaintiffs' home and state further how the Beneficiary acquired  
3 such status.

4       ANSWER: NWTS incorporates by reference and as if fully set forth herein the previous  
5 response to Interrogatory No. 6 as set forth in the First Responses and the March 2012 Letter.  
6

7       **INTERROGATORY NO. 7:** Identify and describe the financial transaction that took place  
8 upon the trustee's sale in this matter, including:

- 9       a.      The identity of the person employee who approved the transaction.  
10      b.      What funds flows among which entities and for what purpose.  
11      c.      Breakdown of fees and costs paid by Freddie Mac.  
12      d.      The total number of bids received and the basis for the acceptance of Freddie Mac's  
13 offer.

14       ANSWER: NWTS incorporates by reference all previous objections to this  
15 Interrogatory. Without waiving any previous objection, Defendant NWTS amends its response to  
16 subparts (b),(c), and (d) set forth in the March 2012 Letter as follows:

17       As to subpart (b), NWTS objects to subpart (b) on the basis that it is vague, ambiguous,  
18 and NWTS is unable to ascertain what information is being requested.

19       As to subpart (c), Freddie Mac paid no fees or costs to NWTS.  
20

21       As to subpart (d), NWTS received only 1 bid. Chase Home Finance LLC submitted the  
22 high bid at sale. By direction from Chase Home Finance LLC and course of dealing,  
23 NWTS is directed to and did issue the Trustee's Deed to the benefit of Federal Home  
24 Loan Mortgage Corporation.  
25  
26

## **ATTORNEY CERTIFICATION**

The undersigned, as attorney for Defendant Northwest Trustee Services, Inc. certifies to the best of her knowledge, information and belief, formed after a reasonable inquiry that the responses and objections are: (1) consistent with the Civil Rules and warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; (2) not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation; and (3) not unreasonable or unduly burdensome or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy and the importance of the issues at stake in the litigation.

DATED this 26<sup>th</sup> day of April, 2012.

# ROUTH CRABTREE OLSEN, P.S.

Heidi E. Buck, WSBA No. 41769  
Of Attorneys for Defendants Northwest  
Trustee Services, Inc. and Routh Crabtree  
Olsen, P.S.

DEFENDANT NWTS' RESPONSES TO  
PLAINTIFFS' INTERROGATORIES AND  
RFPS.10 of 11 C11-01445 MJP

**ROUTH  
CRABTREE  
OLSEN, P.S.**

13555 SE 36th St., Ste 300  
Bellevue, WA 98006  
Telephone: 425.458.2121  
Facsimile: 425.458.2131